From: Bitalac, Emily
Sent: Wednesday, November 2, 2022 2:31 PM
To: Barajas, Emily K CIV USARMY CENWP (USA) <Emily.K.Barajas@usace.army.mil>; NWP-ODV-DexterFF-Upgrade <dexterfishfacility.upgrade@usace.army.mil>
Subject: EPA Comments on Dexter Fish Facility Upgrades DEA

Dear Emily & Ross,

The US Environmental Protection Agency has reviewed the US Army Corps of Engineers' Draft Environmental Assessment for the Dexter Fish Facility Upgrades in Lane County, OR. EPA conducted its review pursuant to the National Environmental Policy Act and Section 309 of the Clean Air Act. EPA supports improvements to fish collection, handling, and transportation for the benefit of salmon, summer steelhead, and trout

Our review finds the DEA includes sufficient information on anticipated environmental impacts and measures to offset the impacts, including use of Best Management Practices. Although the project will not result in significant impacts, EPA recommends the Final EA include more clarifying information on impacts to water quality and other resources as discussed below.

Impacts to water quality
Section 4.9 of the DEA discusses water quality and indicates that the Middle Fork Willamette River is listed for dissolved oxygen on the CWA Section 303(d) list of impaired waters (ODEQ 2012). As determined by the ODEQ, all three reservoirs on MFWR are 303(d) water quality limited due to toxic levels of aquatic weeds or algae. Reaches from Dexter Dam to Lost Creek were 303(d) listed for year-round temperature exceedances and spawning period dissolved oxygen and temperature exceedances.

The proposed project may result in impacts to water quality due primarily to increased turbidity and suspended sediments resulting from in-water work. EPA recommends the FEA include information to demonstrate that the proposed action will adhere to the antidegradation provisions of the Clean Water Act to prevent deterioration of water quality.

Describe plans to coordinate with ODEQ, and all affected tribes to assure that state and tribal water resources are protected from impacts associated with construction and operation of the proposed action.

Environmental Justice
EPA recommends the FEA analyze Environmental Justice (EJ) at a more local scale. The DEA includes demographic information for Lane County. EPA recommends selecting block groups that overlap with the project area to estimate the potential disproportionate impacts to communities with EJ concerns of those living within the project area. Assessing EPA's Environmental Justice Screening and Mapping Tool (EJScreen) information is a useful first step in understanding or highlighting locations that may be candidates for further review or outreach. EPA considers a project to be in an area of potential EJ concern when an EJScreen analysis for the impacted area shows one or more of the eleven EJ Indexes at or above the 80th percentile in the nation and/or state. At a minimum, EPA recommends an EJScreen analysis consider EJScreen information for the block group(s) which contains the proposed action(s) and a one-mile radius around those areas.

Tribal Consultation
EPA encourages the Corps to consult with the Tribes and incorporate feedback from the Tribes when making decisions regarding the project. EPA recommends the FEA describe the issues raised during the consultations and how those issues were addressed.

Coordination with on-going environmental assessments
EPA recommends the FEA analysis clarify how it is being coordinated with the ongoing Programmatic EIS analysis for the Willamette Valley Systems and other associated EISs and EAs.

Thank you for the opportunity to provide informal comments on this DEA outside of the official comment period. If you have questions about these comments, please contact me for assistance.

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